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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: **Amendment of E-911 Phase 2 Implementation Plan**
Cellular South Licenses, Inc. TRS # 808884
(Assignee of Telepak, Inc.)

Dear Ms. Dortch:

On behalf of the above-referenced carriers, and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding the company's amended E-911 Phase 2 implementation plans.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,



David L. Nace

Confirmed

DEC 12 2002

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c: Qualex International (w/ enc. on diskette)
Policy Division, Wireless Telecommunications Bureau, FCC (w/ enclosure)

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**CELLULAR SOUTH LICENSES, INC.
(Assignee of Licenses held by Telepak, Inc.)**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Amended E-911 Phase II Implementation Plan Report

Background/Contact Information

(1) Carrier Identifying Information

Cellular South Licenses, Inc.¹
TRS # 808884

(2) Contact Information

Tony Kent, Vice President Network Operations
Cellular South Licenses, Inc.
125 South Congress Street, Suite 1100
Jackson, MS 39201
Phone 601-974-7113
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E911 Phase II Location Technology Information

(1) Type of Technology

Cellular South Licenses, Inc. ("CSL" or "Cellular South") provides wireless services using a combination of AMPS, TDMA and, most recently and in only some areas, CDMA technologies. In some markets, such as in Mobile, Alabama, only TDMA technology is presently in use while in others, both AMPS and TDMA technologies are being used. Deployment of CDMA as an overlay of TDMA technology in portions of CSL's service area is part of an ongoing effort to adapt to current market conditions and allow for roaming in an environment where several larger wireless carriers have announced plans to discontinue use of TDMA technology.

^{1/} The radio station licenses held by Telepak, Inc. were assigned to Cellular South Licenses, Inc. in a *pro forma* transaction which took place on April 25, 2001. Cellular South Licenses, Inc., as the successor in interest to Telepak, Inc., and as current operator of the CMRS facilities subject to E911 Phase II implementation requirements, submits this amendment to the report submitted by Telepak, Inc. on November 9, 2000, as subsequently amended.

Due to the lack of a common digital operating technology throughout its service areas CSL now considers a handset-based technology to be the most practical means to make available Phase II services in its operating areas. The anticipated limited availability of TDMA compatible handsets in the future makes it unlikely that a network-based technology can be deployed successfully in any of CSL's service areas where TDMA technology is the only digital technology in use. It now appears that with a CDMA system in much of CSL's service area it will be more practical to plan for a Phase II E911 handset-based solution. To that end CSL has consulted with some of the major handset manufacturers, and determined that a handset approach will be more efficient. CSL continues to receive and is in the process of evaluating available products that would enable CSL to deploy a handset-based technology for Phase II.

(2) Testing and Verification

CSL has not itself conducted tests of Phase II technology. It will review and evaluate the test results and accompanying technical information provided by potential providers of equipment, services and software. CSL will adopt its own testing and verification methods and procedures based on sound engineering and statistical practices, referring to the principles and standards set forth in OET Bulletin 71. This testing and verification will likely be incorporated into routine testing by company technicians once a handset-based solution has been implemented.

(3) Implementation Details and Schedule

- In a separately filed petition, CSL is requesting the Commission to afford it the same time made available to other small and regional wireless carriers defined as "Tier III" carriers in the Commission's *Order to Stay*, 17 FCC Rcd 14841, released July 26, 2002 ("Extension Order"). It is Cellular South's intention to begin selling and activating location-capable handsets no later than September 1, 2003, and otherwise to comply with the deadlines applicable to Tier III carriers as set out in paragraph 33 of the Extension Order; and
- Cellular South will notify the FCC of any change in its schedule for implementation. Cellular South recognizes that the Commission's rules require the deployment of a Phase II system, even if none exists which fully meets the Commission's accuracy requirements.

(4) PSAP Interface

Cellular South intends to work with each PSAP to mutually determine the best method of delivering Phase II information to that PSAP. It is Cellular South's intention to deploy the necessary hardware and software changes to timely deliver the Phase II information after receipt of a valid Phase II request. Where appropriate, Cellular South will work with PSAPs to convert the PSAP interface to non-call path associated signaling ("NCAS") to accommodate the increased

messaging requirements resulting from implementation of E911 capabilities.

(5) Existing Handsets

It is anticipated that Cellular South's handset-based solution will create a Phase II capability that will provide enhanced ALI information from the commencement of implementation.

(6) Location of Non-Compatible Handsets

It is Cellular South's intention to employ a handset-based solution that will ensure that E911 calls coming from handsets that are incompatible with Cellular South's technology solution will be delivered to the PSAP with E911 Phase I information. At a minimum, non-subscribers to Cellular South service with network-based systems roaming into a Cellular South market will receive Phase I capabilities within the PSAP areas that are Phase I capable.

(7) Other Information

Cellular South remains dedicated to timely implementation of E911 Phase II ALI capabilities that comply with the Commission's accuracy requirements to the greatest degree technically possible. While Cellular South cannot control equipment availability or vendors' delivery schedules, it will work diligently to implement a handset-based E911 Phase II solution for its in-place CDMA network, and continue research of any available Phase II solution for markets served only with a TDMA network.

CSL is in receipt of a Phase II E911 implementation request from the Mobile County Communications District ("MCCD") of Mobile, Alabama. CSL instructed its special contractor for Phase I E911 implementation to make inquiries of MCCD to determine if it is fully prepared to implement Phase II E911 services, and assist CSL in determining whether or not the MCCD request meets the objective criteria a PSAP must show to establish that the request is "valid" under the terms of Section 20.18(j) of the Commission's rules. It is unclear at this time whether MCCD has taken sufficient steps to assure that it will be able to receive and utilize the E911 data prior to the delivery of service by the carrier.

CSL is also in receipt of a Phase II deployment request from the Tennessee Emergency Communications Board ("TECB"), dated August 27, 2002, relating to all counties in state of Tennessee that are served by CSL. CSL has contacted the TECB concerning its proposed deployment schedule, such that the initial deadline for compliance would be consistent with that granted to other Tier III wireless carriers in the FCC's Extension Order.